

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In Re: Flint Water Cases

Case No. 5:16-cv-10444-JEL-MKM

Honorable Judith E. Levy

Magistrate Judge Mona K. Majzoub

**COREY M. STERN'S DISCLOSURE OF PRIOR DISCOVERY PURSUANT TO
THE DISCOVERY COORDINATION PROTOCOL ORDER**

NOW COMES Corey M. Stern, in his capacity as Co-Liaison Counsel and on behalf of his own individual clients, and provides the following information pursuant to the Discovery Coordination Protocol Order (Dkt. 566) entered on August 17, 2018:

1. The undersigned Counsel has taken or participated in only one deposition in proceedings falling within the definitions of Federal Flint Water Cases or State Flint Water Cases contained in the Discovery Coordination Protocol Order: The jurisdictional deposition of Edward Benes, which was conducted on January 10, 2018, at the offices of Drinker, Biddle & Reath in Dallas, Texas, following Notice to counsel in both the Federal and State Flint Water cases.

2. The undersigned Counsel participated with other parties in the service of four non-party, documents-only subpoenas to the U.S. Environmental Protection Agency, Genesee County Health Department, Virginia Polytechnic Institute and State University, and Professor Marc Edwards in In re Flint Water Cases, Case No. 5:16-cv-10444-JEL-MKM. These subpoenas were served on June 15, 2018, but documents have not yet been produced in response.

Respectfully Submitted,

/s/ COREY M. STERN

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Dated: August 31, 2018

CERTIFICATE OF SERVICE

I hereby certify that on August 31, 2018, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing upon counsel of record.

/s/ COREY M. STERN

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